

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

DAVID WILLIAM WOOD,  
Plaintiff,

v.

Civil No. 3:15-cv-00594-MHL

CREDIT ONE BANK, N.A.,  
Defendant.

**DEFENDANT'S PROPOSED JURY VERDICT FORM**

1. We, the jury, after careful consideration of the evidence and the Court's instructions, find by a preponderance of the evidence that the Defendant, Credit One Bank's violation of the Fair Credit Reporting Act was:

\_\_\_\_\_ Negligent

\_\_\_\_\_ Willful

2. Did the Plaintiff, David Wood, demonstrate by a preponderance of the evidence that the Defendant, Credit One Bank's violation of the Fair Credit Reporting Act proximately caused him actual damages?

\_\_\_\_\_ Yes

\_\_\_\_\_ No

If you answered "Negligent" in response to question no. 1 and "No" in response to question no. 2, please stop here.

3. If you answered "Yes" to question no. 2, please indicate the amount of actual damages that you find were proximately caused by Credit One Bank's violation:

\$ \_\_\_\_\_

If you answered "Negligent" in response to question no. 1, please stop here.

4. If you answered “Willful” in response to question no. 1, and you answered “No” in response to question no. 2, please indicate the amount of statutory damages, in amount between \$100.00 and \$1,000.00, that you choose to award:

\$ \_\_\_\_\_

5. If you answered “Willful” in response to question no. 1, and you have decided that punitive damages are warranted, based on the Court’s instructions, please indicate the amount of punitive damages that you choose to award:

\$ \_\_\_\_\_

Date: \_\_\_\_\_

Foreperson: \_\_\_\_\_